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REMARKS

In the Office Action mailed on January 2, 2003, claims 1-16 and 21-23 were rejected. By this response, claims 1, 14, and 21 have been amended. Claims 1-16 and 21-23 remain pending in the present application. Reconsideration of the rejection and allowance of the pending claims are respectfully requested. In addition, the Applicant's would like to note that the Office Action does not indicate that the Examiner obtained supervisory approval for reopening prosecution after appeal, as required by M.P.E.P. § 1208.01.

Objections to the Drawings

The drawings were objected to under 37 CFR 1.83(a). Specifically, the Examiner stated that: "The drawings must show every feature of the invention specified in the claims. Therefore, 'the plurality of stator sections are fluidicly coupleable to allow a fluid flow therethrough' must be shown or the feature(s) cancelled from the claim(s)."

Applicants respectfully traverse the objection. All of the recited features of the claims are illustrated in the drawings. Specifically, the application recites the following: "A passageway 80 allows motor oil to pass from one modular stator section to another." See Application, page 13, lines 14-16. Passageway 80 is illustrated in Fig. 2. Therefore, the features cited by the Examiner are illustrated in the drawings. Withdrawal of the objection is respectfully requested.

Rejection Under 35 U.S.C. § 102(b)

In the Office Action, claims 1, 2, 6-15, 17-21, and 23 were rejected under 35 U.S.C. §102(b) as being anticipated by Ekstromer. Claims 1, 2, 6-15, 17-21, and 23 are not anticipated because the Ekstromer reference does not disclose all of the recited features of the claims.

The Examiner did not cite a patent number for the Ekstromer reference. Unfortunately, two Ekstromer patents have been cited previously by the Examiner. The patent numbers for the two previously cited Ekstromer patents are: U.S. Patent No. 2,098,958 and U.S. Patent No. 1,960,484. From the substance of the Office Action, it would appear that the Examiner intended

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to reject the claims as being anticipated by Ekstromer, U.S. Patent No. 1,960,484. Accordingly, the Ekstromer reference referred to in the present response is U.S. Patent No. 1,960,484.

Claims 1, 2, and 6-13

Some of the recited features of amended independent claim 1 that are not disclosed by the Ekstromer reference are "a single rotor shaft disposed through the plurality of stator sections." The Ekstromer reference discloses a motive power unit 16 comprising a plurality of electric motors. See Ekstromer, page 2, lines 42-46. Each electric motor has a stator winding 23 and a rotor shaft 24. See Ekstromer, page 2, lines 63-67. The rotor shaft 28 of each motor is coupled to the rotor shaft 28 of an adjacent motor by a shaft coupling. See Ekstromer, page 2, lines 81-84. Furthermore, none of the rotor shafts 28 extend through a plurality of the motors of the Ekstromer reference. Thus, even if we assume that the motors are a plurality of stator sections, the plurality of rotor shafts 28 of the motive power unit 16 are not "a *single* rotor shaft disposed *through* the plurality of stator sections." Therefore, the Ekstromer reference does not disclose all of the recited features of independent claim 1 or anticipate claim 1. Claims 2 and 6-13, which depend from independent claim 1, also are not anticipated by the Ekstromer reference for its reasons provided about with reference to claim 1 as well as for the subject matter recited in each of the dependent claims.

Claims 14, 15, and 17-20

Some of the recited features of amended independent claim 14 that are not disclosed by the Ekstromer reference are "a plurality of modular motor sections, each motor section comprising a stator section and a housing section defining an outer surface of the submersible pumping system." As discussed above, the motive power unit 16 of the Ekstromer reference comprises a plurality of electric motors. Each of the motors has a frame 22. All of the electric motors of the Ekstromer reference are surrounded by a motor enclosing casing 32. See Ekstromer, page 2, lines 77-80. Thus, the casing 32 defines the outer surface of the motive power unit and not the frames 22 of the electric motors. Accordingly, the Ekstromer reference does not disclose "a plurality of modular motor sections, each motor section comprising a stator section and a housing section defining an outer surface of the submersible pumping system" as

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recited in dependent claim 14. Claims 15 and 17-20, which depend from independent claim 14, also are not anticipated by the Ekstromer reference for its reasons provided about with reference to claim 14 as well as for the subject matter recited in each of the dependent claims.

Claims 21 and 23

Some of the recited features of amended independent claim 21 that are not disclosed by the Ekstromer reference are "a plurality of stator sections adapted to form a stator of a desired length, wherein each of the plurality of stator sections comprises at least one of a threaded collar and a threaded portion adapted to receive the threaded collar to enable each of the plurality of stator sections to be mechanically and electrically connected to an adjacent stator section." The Ekstromer reference utilizes bolts 39 which pass through flanges on the frames 22 to secure the motors together end-to-end. See Ekstromer, page 2, lines 121-125. Thus, the Ekstromer reference does not disclose "a plurality of stator sections adapted to form a stator of a desired length, wherein each of the plurality of stator sections comprises at least one of a threaded collar and a threaded portion adapted to receive the threaded collar to enable each of the plurality of stator sections to be mechanically and electrically connected to an adjacent stator section." Therefore, the Ekstromer reference does not disclose all of the recited features of independent claim 21 or anticipate claim 21. Claim 23, which depends from independent claim 21, also is not anticipated by the Ekstromer reference for its reasons provided about with reference to claim 21 as well as for the subject matter recited in each of the dependent claims.

For all of these reasons, the Ekstromer reference does not anticipate claims 1, 2, 6-15, 17-21, and 23. Withdrawal of the rejection and allowance of claims 1, 2, 6-15, 17-21, and 23 are respectfully requested.

Rejection Under 35 U.S.C. § 103

Claims 3-5, 16, and 22 are rejected under 35 U.S.C. §103(a) as being unpatentable over Ekstromer in view of Bogdanov et al., U.S. Patent No. 4,010,392. Claims 3-5, 16, and 22 are patentable because the cited references do not show all of the recited features of the claims. Claims 3-5 depend from independent claim 1, claim 16 depends from independent claim 14, and

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claim 22 depends from independent claim 21. The Bogdanov et al. reference does not obviate the deficiencies of the Ekstromer reference in regard to independent claims 1, 14, and 21. Therefore, claims 3-5, 16 and 22 are patentable by virtue of their dependence from independent claims 1, 14, and 21, as well as by virtue of their own recited subject matter. Withdrawal of the rejection and allowance of claims 3-5, 16, and 22 are respectfully requested.

Attachment

Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendment. The attached page is captioned "VERSION WITH MARKINGS TO SHOW CHANGES MADE."

Conclusion

In view of the above remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Date: April 2, 2003

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"VERSION WITH MARKINGS TO SHOW CHANGES MADE."

Please amend claims 1, 14, and 21 as follows:

1. (Amended) An electric motor, comprising:

a plurality of stator sections, each stator section ~~including~~ comprising an outer housing, wherein the plurality of stator sections are mechanically and electrically coupleable to form a stator of a desired length; and

a single rotor shaft, disposed ~~within~~ through the plurality of stator sections.

14. (Amended) A submersible pumping system, comprising:

a submersible electric motor, ~~including~~ comprising:

a plurality of modular motor sections, each motor section ~~includes~~ comprising a stator section and a housing section defining an outer surface of the submersible pumping system, wherein the modular motor sections are mechanically and electrically coupleable to form a motor of a desired length;

a rotor disposed within the plurality of modular motor sections; and

a submersible pump, drivingly coupled to the rotor of the submersible electric motor.

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21. (Amended) An electric motor for a submergible pumping system, comprising:

a plurality of stator sections adapted to form a stator of a desired length, wherein each of the plurality of stator sections comprises at least one of a threaded collar and a threaded portion adapted to receive the threaded collar a ~~mechanically and electrical coupling to permit selective attachment~~ enable each of the plurality of stator sections to be mechanically and electrically connected to an adjacent stator section; and

a rotor shaft disposed ~~within~~ through the plurality of stator sections.

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